

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

TBS NORTH AMERICA LINER, LTD., Plaintiff, vs. SAN JUAN NAVIGATION CORP., Defendants.	Case No.:	AFFIDAVIT PURSUANT TO SUPPLEMENTAL RULE B
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STATE OF MINNESOTA)	
)	
COUNTY OF HENNEPIN)	ss.:

I Gerardo Alcazar, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and a member of the firm of Robins, Kaplan, Miller & Ciresi L.L.P., attorneys for the Plaintiff herein. I am familiar with the facts of this case and make this affidavit in support of Plaintiff's prayer for the issuance of a Writ of Maritime Attachment and Garnishment, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

2. I have attempted to locate SAN JUAN NAVIGATION CORP. within this District. As part of my investigation to locate the Defendant within this District, I examined the telephone company information directory,

as well as the white and yellow pages of Minnesota listed on the Internet or World Wide Web, and did not find any listing for the Defendant.

3. In addition, the database of the office of the Minnesota Secretary of State was searched to determine if Defendant was qualified to do business in Minnesota, without result.

4. On information and belief, Defendant, SAN JUAN NAVIGATION CORP. is a foreign business entity organized and existing under the laws of the Marshall Islands with an address at 900 Winslow Way E, Bainbridge Is, WA 98110.

5. In consequence of these searches and inquiries your deponent believes that Defendant cannot be found within the District of Minnesota.

6. Upon information and belief, the Defendant has, or will have during the pendency of this action, tangible and intangible property within the District in the hands of U.S. Bank N.A., in the form of accounts and/or fund transfers identified as follows:

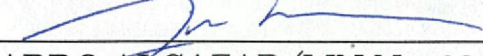
a) accounts in the name of SAN JUAN NAVIGATION CORP.

7. This is Plaintiff's first request for this relief.

WHEREFORE, the Plaintiff respectfully requests that the Court authorize the issuance of process in the form of a Writ of Maritime Attachment and Garnishment seeking attachment and garnishment of

Defendant's tangible and intangible property within this District.

Dated: November 29, 2011

By: 
GERARDO ALCAZAR (MN No. 0386522)

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ATTORNEYS FOR PLAINTIFF
TBS NORTH AMERICA LINER, LTD.

Sworn to before me this
29 day of November, 2011


NOTARY PUBLIC

